

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
GWG Holdings, Inc., <i>et al.</i> , ¹	§	Case No. 22-90032 (MI)
	§	
Debtors.	§	(Jointly Administered)
	§	

**MOTION
FOR WITHDRAWAL OF COUNSEL**

Shirin Bayati, Mojan Kamalvand, Thomas Horton, and Frank Moore (collectively, the “Former Clients”), submit this *Motion for Withdrawal of Counsel* (the “Motion”) and respectfully state as follows:

1. The Former Clients have been represented in this matter by their counsel of record, Eric M. English and M. Shane Johnson of Porter Hedges LLP (“Porter Hedges”).
2. Porter Hedges intends to withdraw as counsel of record for the Former Clients.
3. The Former Clients consent to Porter Hedges withdrawing as their counsel of record in this matter.

WHEREFORE, the Former Clients respectfully request that the Court grant their Motion for withdrawal of counsel and any other relief to which they may be entitled.

[Remainder of page intentionally blank]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ proposed claims and noticing agent: <https://donlinrecano.com/gwg>.

Dated: May 13, 2022

PORTER HEDGES LLP

/s/ Eric M. English

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CERTIFICATE OF SERVICE

I hereby certify that, on May 13, 2022, a true and correct copy of the foregoing document was served via email through the Bankruptcy Court's Electronic Case Filing System on the parties that have consented to such service.

/s/ *Eric M. English*

Eric M. English